

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHANIECE MATHEWS, as guardian *ad*,
litem and on behalf of her son D.W.,

Plaintiff,

v.

The State of Illinois et al.,

Defendants.

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No. 18-cv-6675

Judge Joan B. Gottschall

**PLAINTIFF’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE AN AMENDED COMPLAINT**

Plaintiff Shaniece Mathews, by her undersigned counsel, moves for an extension of time of three weeks to file her fourth amended complaint in this action. The filing of the fourth amended complaint is now due on October 3, 2023, and Plaintiff seeks leave of Court to file it on October 24, 2023. In support of this motion Plaintiff states:

1. The undersigned counsel is in a small firm of three lawyers, one of whom has taken a temporary medical leave of absence. As a result, the undersigned counsel has been required to assume his colleague’s heavy workload temporarily in various cases and will need additional time to prepare an appropriate new pleading for this Court.

2. Unrelated to that leave, the undersigned counsel also expects to file a petition for certiorari in the United States Supreme Court from the decision of the Seventh Circuit in *Uetracht et al v. Chicago Parking Meters LLC*, U.S. Ct. of Appeals, 22-1166, now due on October 4, 2023, and to participate in person at a hearing on October 5, 2023, for *National Association of Government Employees v. Janet Yellen and Joseph Biden*, 23-cv-11001 (U.S.D.C.) (Mass.) a suit to challenge the constitutionality of the federal debt limit statute.

3. Defendants have no objection to this motion. This temporary delay in the filing of the fourth amended complaint will not prejudice any party.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests an extension of time to October 24, 2023, to file a fourth amended complaint.

Respectfully submitted,

Dated: September 21, 2023

By: /s/ Thomas H. Geoghegan
One of Plaintiff's Attorneys

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